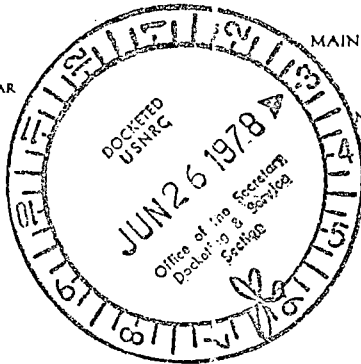


*Law Offices of*  
**VALORE, McALLISTER, ARON & WESTMORELAND**

A PROFESSIONAL CORPORATION

CARL VALORE, JR.  
ROBERT N. McALLISTER  
HARRIS ARON  
MEMBER N.J., FLA. & D.C. BAR  
R.C. WESTMORELAND  
THOMAS J. VESPER  
MEMBER N.J. & D.C. BAR  
PASQUALE J. CARDONE  
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ATLANTIC CITY OFFICE  
GUARANTEE TRUST BUILDING  
ATLANTIC CITY, N. J. 08401  
(609) 344-6539

COUNTY OFFICE  
319 CAPE MAY AVENUE  
MAYS LANDING, N. J.  
(609) 625-9106

June 22, 1978

IN REPLY REFER TO  
Northfield OFFICE  
78/385 FILE NO

Gary L. Milhollin, Esq., Chairman  
Atomic Safety & Licensing Board  
1815 Jefferson Street  
Madison, Wisconsin, 53711

Re: Public Service Electric & Gas Co.  
Salem Generating Station - Unit #1  
Docket No. STN 50-272

Dear Chairman Milhollin:

Please be advised that I have been substituted as legal counsel in this matter for Lower Alloways Creek and have been appointed as Special Nuclear Counsel in respect to the application of Public Service Electric & Gas Co., Docket No. STN 50-272.

According to the terms of the May 18, 1978, Special Prehearing Conference, a report was to be given to the Board at least "four weeks from the date of the Conference".

I recently had the opportunity to speak with Board member Glen O. Bright on a conference call with the Attorney for the NRC Staff and Applicant, and have filed an appropriate motion requesting an extension of compliance with the May 18, 1978 Order to Monday, June 26, 1978.

Please consider this letter our compliance with the May 18, 1978, Order requiring a report and the proposed language for the final form of Contention #8.

I am authorized on behalf of the Lower Alloways Creek Township to abandon Contention #7.

Our suggested language for Contention #8 is as follows:

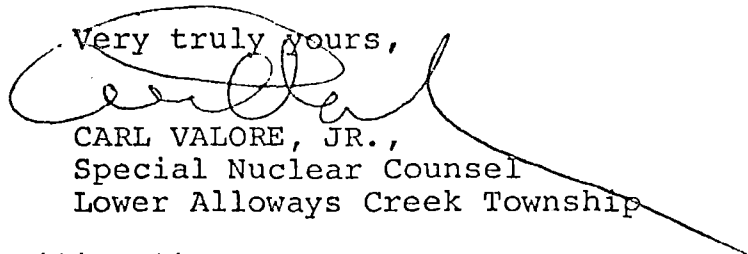
H 24-

"Under the proposed modification, there will be increased reliance on The Residual Heat Removal System. The increased reliance and probability of overload will lessen the ability of the system to perform its safety back-up function. The probability and consequences of failure under increased load should be determined."

I must report that the Township of Lower Alloways Creek by a vote of 3 to 2 on June 14, 1978, rejected a draft of a settlement agreement referred to on page 4 of the Order following Special Prehearing Conference entered by the Board on May 24, 1978.

Negotiations and meetings took place from May 18, 1978 to June 14, 1978 in an effort to prepare an agreement the result of which would be a withdrawal of the Township's Petition for Leave to Intervene and the resolution of certain matters of the Township's concern. However, the draft agreement was unsatisfactory and rejected at a regular Township meeting.

Very truly yours,



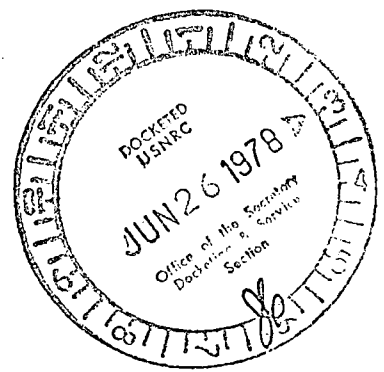
CARL VALORE, JR.,  
Special Nuclear Counsel  
Lower Alloways Creek Township

CC: See attached mailing list

CV/sgp

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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IN THE MATTER OF )

PUBLIC SERVICE ELECTRIC & GAS )  
COMPANY )

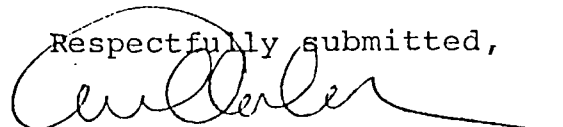
DOCKET NO. 50-272

(Salem Generating Station,  
Unit #1) )

NOTICE OF APPEARANCE

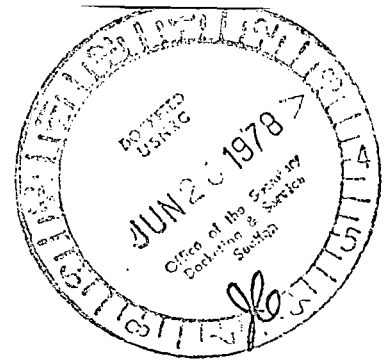
PLEASE TAKE NOTICE, that Carl Valore, Jr., a member of the firm of Valore, McAllister, Aron & Westmoreland, P.A., 535 Tilton Road, Northfield, N.J., 08225, member of the bar of the State of New Jersey and admitted to practice before the United States Supreme Court and the United States District, District of New Jersey, appears as Attorney of Record for the Township of Lower Alloways Creek, who has been accepted as an Intervenor in the above proceedings.

Respectfully submitted,

  
CARL VALORE, JR.

Dated: June 22, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



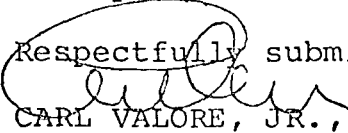
IN THE MATTER OF )  
PUBLIC SERVICE ELECTRIC ) Docket No. STN-50-272  
& GAS COMPANY )  
(Salem Generating Station )  
Units #1) )

INTERVENOR TOWNSHIP OF LOWER ALLOWAYS CREEK  
MOTION FOR EXTENSION OF TIME OF  
SPECIAL PREHEARING ORDER DATED MAY 24, 1978

Intervenor, Township of Lower Alloways Creek,  
moves the Atomic Safety and Licensing Board, for an order  
granting an extension of time to comply with the order following  
the Special Prehearing Conference held on May 18, 1978 and  
dated May 24, 1978, so as to permit the Intervenor, Township  
of Lower Alloways Creek, to file a report and final language  
for Contention #8, on or about June 26, 1978.

In support of this motion, the Intervenor, Township  
of Lower Alloways Creek, will rely on the attached Affidavit.

Respectfully submitted,

  
CARL VALORE, JR.,  
Special Nuclear Counsel for  
Intervenor Township of Lower Alloways Creek

Dated: June 22, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

PUBLIC SERVICE ELECTRIC  
& GAS CO.

(Salem Generating Station  
Unit #1)

)

)

)

)

Docket No. STN 50-272

AFFIDAVIT OF CARL VALORE, JR.

STATE OF NEW JERSEY:

SS

COUNTY OF ATLANTIC:

I, CARL VALORE, JR., being duly sworn according to law,  
upon my oath depose and say:

1. I am a member of the Bar of the State of New Jersey  
and admitted to practice before the United States Supreme Court,  
and the United States District Court for the District of New Jersey.

2. On June 15, 1978, I was contacted by Mayor Samuel  
Donelson of the Township of Lower Alloways Creek and requested to  
attend a special evening meeting of the Township on June 15, 1978.

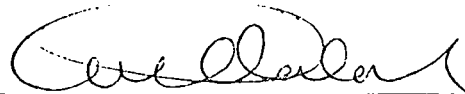
3. At the meeting of June 15, 1978, a Resolution was  
passed designating me as Special Nuclear Counsel for the Township  
of Lower Alloways Creek in respect to the application bearing  
docket #50-272.

4. On June 16, and June 19, 1978, I attempted to  
reach the Attorney for the Applicant, the Chairman of the Board,  
the NRC Staff Counsel, and other Board Members, and a conference  
call was held on June 19, 1978, between the Applicant's Attorney,

a Member of the Board and the NRC Staff Attorney. Pursuant to this conference, I was directed to file the within Notice of Motion for extension of time to comply with the Order following the Special Prehearing Conference of May 18, 1978, dated May 24, 1978.

5. On June 22, 1978, I placed in the mail, a letter addressed to the Chairman of the Atomic Safety and Licensing Board, Gary L. Milhollin, Esq., setting forth the final language of Contention #8, abandoning Contention #7, reporting the results of the negotiations that took place between the applicant - licensee and the Township in an effort to settle the matter subject to the application and intervention.

6. Based on the recent entry into the case as legal counsel, the affiant, respectfully requests on behalf of the Township of Lower Alloways Creek an extension of time to comply with the aforementioned Order.

  
CARL VALORE, JR., Special  
Nuclear Counsel for Township  
of Lower Alloways Creek

Sworn to and subscribed to  
before me this 22nd Day of  
June, 1978.



ELAINE A. BRENNER  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires July 6, 1978

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of

PUBLIC SERVICE ELECTRIC  
& GAS COMPANY

(Salem Nuclear Generating  
Units #1)

)

)

)

Docket No. STN 50-272

CERTIFICATE OF SERVICE

I hereby certified that copies of the documents entitled Notice of Appearance, Intervenor Township of Lower Alloways Creek, Notice of Motion with Supporting Affidavit and letter addressed to Chairman Gary L. Milhollin, Atomic Safety and Licensing Board, outlining suggested language for Contention #8, have been deposited in the United States Mail, Northfield, N.J., postal office, on Thursday, June 22, 1978 addressed to the following:

Gary L. Milhollin, Esq.  
Chairman, Atomic Safety and Licensing Board  
1815 Jefferson Street  
Madison, Wisconsin, 53711

Mr. Glen O. Bright  
Atomic Safety and Licesning Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555

Dr. James C. Lamb, III  
313 Woodhave Road  
Chapel Hill, North Carolina, 27514

Mark J. Wetterhahn, Esq.  
for Troy B. Conner, Jr., Esq.  
1747 Pennsylvania Avenue, N.W.  
Suite 1050  
Washington, D.C., 20006

William Potter, Esq.  
Public Advocate  
Department of the Public Advocate  
Box 141  
Trenton, N.J., 08625

Mark L. First, Esq.  
Deputy Attorney General  
Department of Law and Public Safety  
36 West State Street  
Trenton, N.J., 08625

Office of the Secretary  
Docketing and Service Section  
U.S. Nuclear Regulatory Commission  
Washington, D.C., 20555

June D. MacArtor  
Deputy Attorney General  
Tatnall Building  
P.O. Box 1401  
Dover, Delaware, 19901

/s/ Carl Valore, Jr.  
CARL VALORE, JR., Special  
Nuclear Counsel for Lower Alloways  
Creek Township

June 22, 1978